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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

IN RE:	§	CASE NO. 13-10201-hdh-13
	§	Chapter 13
Danial Eugene Montgomery	§	
Ruth Pequeno Montgomery	§	
Debtors	§	
	§	

**DEBTORS' MOTION TO EXTEND THE AUTOMATIC STAY
AND REQUEST FOR INTERIM RELIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Danial Eugene Montgomery and Ruth Pequeno Montgomery, (herein "Debtors"), and files their Motion to Extend the Automatic Stay and Request for Interim Relief, and, in support thereof, would show the court as follows:

1. Debtor(s) Chapter 13 case was filed on August 9, 2013, in the Northern District of Texas, Abilene Division.
2. Debtor(s) filed a prior Chapter 13 bankruptcy case, Case No. 12-10281-RLJ-13, in the Northern District of Texas, Abilene Division on September 27, 2012, and the said case was dismissed without prejudice on July 12, 2013, for failure to make timely payments to the Chapter 13 Trustee.
3. As a result of the Debtor(s) prior bankruptcy case, Case No. 12-10281-RLJ-13, pending within the one year period before Debtor(s) current Chapter 13 Case was filed and pursuant to the provisions of 11 U.S.C. §362(c)(3)(A), the automatic stay will terminate on the 30th day after filing Debtor(s) current Chapter 13 case.
4. Debtor(s) will show this court the filing of the current Chapter 13 case is filed in good faith as to the creditors stayed.

6. Debtor(s) have agreed to enter into a wage withholding order and has submitted the required form to the Chapter 13 Trustee.
7. The Court's next regular general docket to consider such a motion is on August 26, 2013. (less than 21 days from the filing of the motion). The following general docket is scheduled for October 2, 2013, (more than 30 days after the filing of the motion).
8. Unless the Court hears the Debtor(s) Motion to Extend the Automatic Stay on its October 2, 2013, docket, it will be necessary to schedule a "special setting" to comply with the 30 day requirement of 11 U.S.C. §362(c)(3)(B). Debtor(s) request the court to grant the Motion to Extend the Automatic Stay on an interim basis until the Motion can be heard on the October 2, 2013, docket.
9. If the Court grants the relief requested, Debtor(s) counsel will mail notice of the Motion to Extend the Automatic Stay and Request for Interim Relief to all creditors.
10. After a hearing on the motion, Debtor(s) request this Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. §1362(c)(1), 11 U.S.C. §361(c)(2), or a Motion for Relief is granted under 11 U.S.C. §362 (d) and for such further relief to which Debtor(s) may be justly entitled.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) respectfully pray that the Court extend the automatic stay on an interim basis until hearing can be held on the Court's regular docket on October 2, 2013, and after such hearing prays the Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. §1362(c)(1), 11 U.S.C. §362(d)(2) or a Motion for Relief is granted under 11 U.S.C. §362(d), and for such other relief at law and equity to which they may be entitled.

Respectfully Submitted,

/s/Monte J. White
Monte J. White
SNB 00785232
Attorney for Debtors

CERTIFICATE OF SERVICE

The undersigned certifies that on August 9, 2013, a true and correct copy of the foregoing document was transmitted to all parties in interest by ECF and/or regular First Class mail.

Walter O'Cheskey
Standing Chapter 13 Trustee
6308 Iola
Lubbock, Texas 79424

U.S. Trustee
1100 Commerce Street
Room 976
Dallas, Texas 75242-1496

Attached mailing matrix

/s/Monte J. White
Monte J. White
Attorney for Debtors

A Ok Driving School
1845 Industrial Blvd.
Abilene, TX 79602

Applied Card Bank
Attention: Bankruptcy
PO Box 17125
Wilmington, DE 19850

Blockbuster Video
4102 Buffalo Gap Rd
Crossroads S/C
Abilene, TX 79606

Aarons Sales & Lease
3502 Catclaw Dr.
Abilene, TX 79606

AR Recovery Solutions of Hawaii
94 Waipahu Depot St.
Waipahu, HI 96797

Capital One, N.a.
Capital One Bank (USA) N.A.
PO Box 30285
Salt Lake City, UT 84130

ABC Financial Services
P.O. Box 6800
Sherwood, Arizona 72124

Arc Services
Po Box 61123
San Angelo, TX 76906

Cash In Advance
402 W Rancier Ave
Killeen, TX 76541

Abco Transmission
2802 N. 1st. St.
Abilene, TX 79603

Armed Forces Bank
PO Box 3400
Fort Leavenworth, KS 66027-3400

Cash Net USA
P.O. Box 06230
Chicago, IL 60606-0230

Abilene Teachers Federal Credit
PO Box 5706
Abilene, TX 79608

Asset Acceptance Llc
Po Box 1630
Warren, MI 48090

Cb Med Col
304 E Church St
Killeen, TX 76541

Abilene Used Auto Sales
497 E S 11th Street
Abilene, TX 79602

At & T
P.O. Box 930170
Dallas, TX 75393-0170

Check 'n Go
4379 S 1st St.
Abilene, TX 79603

Ace Credit Services
3517 N. 1st St.
Abilene, TX 79603

Atmos Energy
PO Box 650653
Dallas, TX 75265-0653

Chela/Sallie Mae
Attn: Claims Department
PO Box 9500
Wilkes-Barre, PA 18773

Acs/brazos
245 Acs Brazos Wy
Caldwell, TX 77838

AUCS Financial, Inc.
497B E. S. 11th
Abilene, TX 79602

Cisco Junior College
101 College Heights
Cisco, TX 76437

American State Bank
P.O. Box 267
Abilene, Texas 79604

Baker College
1116 West Bristowl
Flint, MI 48507

Citi Bank
3409 S. 14th St.
Abilene, TX 79605

Anytime Fitness Gym
4762 S 14th St.
Abilene, TX 79601

Bank Of America
4161 Piedmont Pkwy
Greensboro, NC 27410

City of Abilene
City Attorney
555 Walnut
Abilene, TX 79601

City of Copperas Cove Water Util 914 Tank Street Copperas Cove, TX 76522	Devry 801 Commerce Dr. Oakbrook, IL 60523	First Abilene Fed Cr U 1118 Pine St Abilene, TX 79601
Clinical Pathology Associates P.O. Box 3138 Abilene, Texas 79604	Dfas-cl Indianapolis Attn: Customer Service Dept 330 8899 E 56 St Indianapolis, IN 46249	First Financial Bank NA 400 Pine St. Abilene, TX 79601
Cmre Financial Services Inc 3075 E Imperial Hwy Suite 200 Brea, CA 92821	Direct Energy Sec P.O. Box 650272 Dallas, TX 75265-0272	Five Star Emergency Phys 1211 Old Main St. Hartford, KY 42347
Conserve 200 Cross Keys Office Pa Fairport, NY 14450	Dish Network P.O. Box 660589 Dallas, Texas 75266	Flex P.O. Box 37210 Boone, IA 50037-0210
Credit Collections 302 E Church St Killeen, TX 76541	Enhanced Recovery Corp Attention: Client Services 8014 Bayberry Rd Jacksonville, FL 32256	Gary J. Bookeeping & Tax Service 100 Chestnut Abilene, TX 79602
Credit Protection Asso Attn: Bankruptcy PO Box 802068 Dallas, TX 75380	Equidata Attn: Bankruptcy PO Box 6610 Newport News, VA 23606	Gold's Gym 4502 Buffalo Gap Road Abilene, TX 79606
Credit World 2133 S. 1st St. Abilene, TX 79602	ER Solutions PO Box 9004 Renton, WA 98057	Great Lakes Collection Bureau Processing Center PO Box 1688 Buffalo, NY 14240-1688
Danial Eugene Montgomery 2707 Southwest Dr. #205 Abilene, TX 79605	EZ Corp Check Collection 2025 E. St. Elmo Austin, TX 78744	Gymnastics Sports Center 1241 Ben Rickey Dr. Abilene, TX 79602
Day Nursery of Abilene 3434 Sherry Lane Abilene, TX 79603	EZ Money 3202 N. First St. #F Abilene, TX 79603	Hall Air Conditioning 145 Shelton St. Abilene, TX 79603
Dept Of Veterans Affai Po Box 11930 Saint Paul, MN 55111	Financial Control Svc 111 E Center St Lorena, TX 76655	Hardin Simmons University Attn Accounts Receivable 2200 Hickory Street Abilene, TX 79601

Heart Of Texas Fcu
Po Box 11
Waco, TX 76703

Key Property Managment and
Real Estate
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Abilene, Texas 79605

Pentagroup Financial
5959 Corporate Dr.
Suite 1400
Houston, TX 77036

Heart of Texas Internal Medicine
Associates, PA
PO Box 520
Brownwood, TX 76804-0520

Liberty University
1971 University Blvd.
Lynchburg, VA 24502

Personal Credit Plan
604 E Hwy 190 Suite 104
Copperas Cove, TX 76522

Hendrick Medical Center
Collection Department
1900 Pine Street
Abilene, Texas 79601

Market Place Property Management
1711 E. Central Tx Express way
Killeen, TX 76541

Phillip L Day & Associates
290 Private Road 3710
San Antonio, TX 78253

Hendrick Provider Network
P.O. Box 975325
Dallas, TX 75397

Metroplex Adventist Hosp Inc
co Credit Collections
302 E Church Ave
Killeen, Texas 76541

Planet Fitness
2540 Barrow St.
Abilene, TX 79605

Higher One Bank Corp.
115 Munson St.
New Haven, CT 06511

Midland Funding
8875 Aero Dr Ste 200
San Diego, CA 92123

Professional Association for Pe
1850 Hickory St., Suite 102
Abilene, TX 79601

Ic Systems Inc
PO Box 64378
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Internal Revenue Service
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Philadelphia, PA 19114

Navy Federal Credit Union
PO Box 3100
Merrifield, VA 22119-3100

Regent University
1000 Regent University Dr.
Virginia Beach, VA 23464

Irma & George Brown
2130 Valner Ct.
San Diego, CA 92139

NCP Finance Limited Partnership
100 East Third Street, 5th Floor
Dayton, OH 45402

Reliant Energy
P.O. Box 3765
Houston, TX 77253-3765

IRS Special Procedures
Mail Code 5020-DAL
1100 Commerce St, Room 9B8
Dallas, TX 75242

North American
2810 Walker Rd
Chattanooga, TN 37421

Rent A Center
3141 S. 14th St.
Abilene, TX 79605

Jefferson Capital
16 McLeland Rd
Saint Cloud, MN 56303

Northern Resolutions
701 E 60th St N
Sioux Falls, SD 57104

Rome Fin
Po Box 347
Concord, CA 94522

Royal Orleans
2707 Southwest Dr.
Abilene, TX 79605

Sun Loan Company
916 S 31st St Ste A
Temple, TX 76504

University Of Phoenix
4025 S Riverpoint Pky
Phoenix, AZ 85040

Ruth Pequeno Montgomery
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Abilene, TX 79605

T-Mobile
PO Box 37380
Albuquerque, NM 87176-7380

Us Dept Of Ed/glelsi
Po Box 7860
Madison, WI 53707

Salute
Payment Processing
P.O. Box 136
Newark, NJ 07101-0136

Texas Midwest ER Physicians
PO Box 676240
Dallas, TX 75267-6240

Usa Discounters Credit
PO Box 8008
Attn: Bankruptcy Department
Virginia Beach, VA 23450

Second Round Lp
4150 Friedrich Lane Suit
Austin, TX 78744

Texas State Tech College
3801 Campus Dr.
Bellmead, TX 76705

USAA County Mutual Insurance Co
9800 Fredericksburg Road
San Antonio, TX 78288

Security Fin
SFC Centralized Bankruptcy
PO Box 1893
Spartanburg, SC 29304

TG
P.O. Box 659601
San Antonio, TX 78265-9601

USAA Savings Bank
10750 McDermott Fwy
San Antonio, Texas 78288-0596

Security Finance
4201 North First
Abilene, TX 79603

The Cash Store
4245 Southwest Dr.
Abilene, TX 79606

Usdoe/glelsi
2401 International
Madison, WI 53704

Security Finance Auto Loans
1103 Lamar St.
Sweetwater, TX 79556

Time Warner Cable
7010 Airport Rd
El Paso, TX 79906-4941

Verichex
PO Box 3218
Abilene, TX 79604

Service Bureau Inc
2705 81st St
Lubbock, TX 79423

Torres Credit
TCS Inc.
PO Box 189
Carlisle, PA 17013

Verizon Wireless
404 Brock Drive
Bloomington, IL 61701

Sprint
PO Box 79357
City of Industry, CA 91716-9357

Txu Electric/TXU Energy
Attention: Bankruptcy
PO Box 650393
Dallas, TX 75265

Victoria Insurance Group
PO Box 6838
Cleveland, OH 44101-1838

SuddenLink
P.O. Box 78670
Phoenix, AZ 85062-8670

University Accounting Service
P.O. Box 5291
Carol Stream, IL 60197-5291

Wells Fargo Education Financial
EFS Bankruptcy
301 E. 58th St. N.
Sioux Falls, SD 57104

West Central Tx Coll B
Po Box 2586
Abilene, TX 79604

Western Shamrock Corporation
Attention: Bankruptcy
801 S Abe St.
San Angelo, TX 76903

Will & Bonita Harrison
1211 Murray Winn
Windcrest, TX 78239

Williams & Fudge Inc
300 Chatham Ave Ste 201
Rock Hill, SC 29730

World Acceptance Corp
810 W Rancier Ave Ste 600
Killeen, TX 76541

WTU Retail Energy
P.O. Box 21588
Tulsa, OK 74121-1588